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April 24, 2007

New Castle County/Civil Division

The Honorable Mary Pat Thyng
United States District Court
District of Delaware
844 King Street
Wilmington, DE 19801

Re: **Jackson, et al. v. Taylor, et al.**
C.A. No. 05-823-***

Dear Judge Thyng:

I am writing in response to Plaintiff George Jackson's Motion for Leave to Depose Defendants in the above-referenced matter. [D.I. 164].

Defendants are willing to cooperate in making themselves available for deposition.

However, I do want to note that although the Motion references "Plaintiffs," only Mr. Jackson has signed the Motion. Therefore, only Mr. Jackson should be permitted to take Defendants' depositions.

In addition, Mr. Jackson seeks a Court Order directing Defendants' counsel to initiate the scheduling and arrangement of the depositions. It is Defendants' position that Mr. Jackson is responsible for noticing the depositions and arranging for the court reporter. Further, Mr. Jackson is responsible for any expenses incurred in connection with the depositions.

Undersigned counsel is available if the Court requires additional information.

Respectfully,

/s/ Eileen Kelly

Eileen Kelly
Deputy Attorney General

cc: See Attached Service List